

GEORGETOWN UNIVERSITY LAW CENTER Institute For Public Representation

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Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W., TW-A325

Washington, D.C. 20554 RE: Children's Television Obligations of Digital Television Broadcaster, MM Docket

No. 00-167; Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television, MB Docket No. 03-15, RM 9832;

Digital Carriage Rules, CS Docket No. 98-120

Dear Ms. Dortch:

Pursuant to section 1.1206 (b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceedings.

On Wednesday, December 17, 2003, representatives of the Children's Media Policy Coalition met with FCC Commissioner Michael J. Copps and his senior legal advisor, Jordon Goldstein. Attending the meeting were Coalition members Patti Miller, director of the Children and the Media Program at Children Now, Dr. Dale Kunkel, Department of Communications at the University of California Santa Barbara, and Angela J. Campbell, Director of the Institute for Public Representation at Georgetown University Law Center.

The Children's Media Policy Coalition urged the Commission to adopt public interest guidelines to ensure that children's educational and informational needs are met before acting on digital must-carry rules. Noting that the public interest proceeding had been pending for some time, Miller stated that "the FCC should not put the economic interests of the broadcasters ahead of the interests of children."

Coalition members also summarized the proposals made in the Coalition's comments. First, they urged the Commission to adopt programming guidelines for broadcasters that reflect the technical capabilities and increased channel capacity of digital television. The Coalition

recommended that any increase in multicasting channel capacity that broadcasters choose to implement should translate into a commensurate increase in the amount of programming available to children. For instance, the Commission could adopt a guideline that three percent of a broadcaster's total programming should be E/I programming, giving broadcasters flexibility concerning the program stream. It could also retain the three-hour guideline for the "primary" channel, but require additional service to children which could take the form of additional E/I programming, educational datacasting or financial support for noncommercial educational children's programming.

Second, coalition members noted that digital technology could be used to better help parents find E/I programming and avoid programming inappropriate for children. With digital technology, onscreen links could give parents detailed information about the nature of the programming.

Finally, Coalition members noted that the existing children's advertising policy needs to be updated for digital broadcasting. The current separation policy dividing children's programming from advertising needs to be adapted to the new interactive digital environment.

Yours truly,

Angela J. Campbell